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KARDARAS & KELLEHER LLP
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Attorneys for Defendant
SHENZHEN HIGH POWER
TECHNOLOGY CO. LTD.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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ENERGIZER S.A.,

Plaintiff, : 07 CV 7406 (LTS)

Against : ECF CASE

M/V YM GREEN her engines, boilers and : **ANSWER TO PLAINTIFF'S**Tackle in rem: YANG MING MARINE CLAIM FOR INDEMNITY AND

TRANSPORT CORP.; YANGMING (UK) LTD.; : CONTRIBUTION

ALL OCEANS TRANSPORTATION INC.;

KAWASAKI KISEN KAISHA LTD.; CONTERM: HONG KONG LTD.; VANGUARD LOGISTICS

SERVICES HONG KONG LTD.;

FIEGE GOTH CO., LTD.; and SHENZHEN HIGH POWER TECHNOLOGY CO. LTD. :

Defendants.

Defendant SHENZHEN HIGH POWER TECHNOLOGY CO. LTD. ("High Power"), by its attorneys Kardaras & Kelleher LLP, as and for its answer to plaintiff's claim for indemnity and contribution contained in plaintiff's reply dated March 27, 2008 to the counterclaim of defendant Fiege Ltd., alleges upon information and belief as follows:

1. Denies having knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 plaintiff's claim for indemnity and contribution and otherwise leaves the plaintiff to its proof and refers all questions of law to the court.

Filed 08/05/2008

Denies the allegations contained in paragraph 2 of plaintiff's claim for indemnity 2. and contribution as to Defendant SHENZHEN HIGH POWER TECHNOLOGY CO. LTD. but otherwise denies having knowledge and information sufficient to form a belief as to the truth of the allegations as to any other party.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

Defendant SHENZHEN HIGH POWER TECHNOLOGY CO. LTD. claims the 3. benefit of all defenses raised by co-defendants and plaintiff in its response to cross-claims and counterclaims as well as its defenses set forth in its answer to plaintiff's complaint, as if set forth fully and specifically herein and incorporated herein by reference, raised insofar as said defenses may be applicable to defendant High Power.

WHEREFORE, Defendant High Power prays that plaintiff's claim for indemnity and contribution be dismissed with prejudice, together with costs, disbursements and attorney's fees and for such other and additional relief as to the Court may seem just and proper.

Dated: New York, NY August 5, 2008

Respectfully submitted,

KARDARAS & KELLEHER, LLP 44 Wall Street New York, NY 10005 Attorneys for Defendant SHENZHEN HIGH POWER TECHNOLOGY CO. LTD.

By:

William P. Kardaras (WK-8835)

Attorneys for Plaintiff 45 Broadway, Suite 1500 New York, NY 10006

To:

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VENGROW & TEXTOR LLP
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New York, NY 10016

LENNON MURPHY & LENNON Attorneys for Defendant FIEGE GOTH CO. LTD. The Greybar Building 420 Lexington Ave., Suite 300 New York, NY 10170

CERTIFICATE OF SERVICE BY REGULAR U.S. MAIL AND BY ECF

The undersigned declares under penalty of perjury that the following is true and correct:

- 1. I am over the age of eighteen years and I am not a party to this action.
- 2. On August 5, 2008, I served a complete copy of SHENZHEN HIGH POWER TECHNOLOGY CO. LTD.'s Answer to Plaintiff's Claim for Indemnity and Contribution by regular U.S. mail and/or by ECF, to the following attorneys at their respective ECF registered address and/or at the following address:

HILL RIVKINS & HAYDEN LLP Attorneys for Plaintiff 45 Broadway, Suite 1500 New York, NY 10006

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Dated: New York, New York August 5, 2008 Attorneys for Defendant FIEGE GOTH CO. LTD. The Greybar Building 420 Lexington Ave., Suite 300 New York, NY 10170

LENNON MURPHY & LENNON

Dorothy A. Donnelly